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March 17, 2025

VIA ECF

Vernon S. Broderick, United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J.

Date: March 18, 2025

Re: Bernier et al. v. Gard Recycling, Inc. et al.,
Case No.: 23-CV-761 (VSB)

Dear Judge Broderick:

We represent Plaintiffs in the above matter. We write to respectfully request that the Court adjourn Plaintiffs' deadline to move for a default judgment to April 25, 2025. We apologize for the late filing of this letter. This is the first request of this kind. The reason for the request is that my office has been preparing for trial in two matters scheduled in the last few weeks, both of which settled close to or on the eve of trial. As a result, there has been a press of work in other cases in my firm, and we have therefore not been able to draft this motion. We therefore respectfully request that the Court adjourn the deadline to April 25, 2025, which is slightly more than 30 days to account for the Passover holiday that I will be observing.

Thank you for your attention to this matter.

Respectfully Submitted,

/s/

Michael Taubenfeld

Cc: Alex Doljansky and Gustavo Rodriguez (via email at gardrecycling@optonline.net)